

**NAPA COUNTY**

## DEPARTMENT OF PUBLIC WORKS

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Director of Public Works  
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Mr. Rick Breitenbach  
CALFED Bay Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, CA 95814

Dear Mr. Breitenbach:

The staff of the Napa County Public Works Department and the Napa County Flood Control and Water Conservation District appreciates the opportunity to comment on the EIS/EIR for the CALFED Bay-Delta Program.

Our concerns about the several alternatives being studied center on the three key issues raised in our earlier letter to Senator Johannessen. (A copy of our May 12<sup>th</sup> letter is attached.)

In summary, our concerns focus on three key areas:

- Water supply reliability
- Water quality improvement
- Ecosystem restoration

The task of simultaneously reviewing three alternatives, with permutations for each, resulting in twelve scenarios, and immediately concluding which one best meets the diverse interests of all stakeholders appears daunting. It seems as if there should be an interim step, to further evaluate the best two or three scenarios, and ultimately select the one best alternative. The concept of consensus building for at least developing grudging consent from all of the interest groups is of key importance in the long run; we applaud your efforts. Regardless of the method used for reaching consensus on a preferred alternative, we want to weigh in on the issues raised in your programmatic EIS / EIR.

We believe that the one alternative finally selected for construction must immediately and affirmatively address the key concerns raised in our earlier letter.

We are working with our neighboring agency, and co-user of the North Bay Aqueduct, the Solano County Water Agency, on our response to this Draft EIS/EIR. Their comments can be considered to be our comments, especially in the areas of water supply reliability and water quality.

There are some issues, however, upon which we wish to amplify and share our own unique views.

**Water Supply Reliability:** Four cities in Napa County have long planned on the SWP supplying water, through our North Bay Aqueduct (NBA), both now and in the future. NBA water currently represents 48 percent of the municipal and industrial water consumed. Within the next two decades, that reliance will grow to over 60 percent. As one of the SWP contractors, and as the agency watching out for the four cities with whom we subcontract, we must insist and be assured that the reliability of supply from the SWP projects in general, and the NBA in particular, has prominence as the primary concern addressed by any project.

An uninterrupted supply, and an assured supply during drought periods, are two critically important elements. Failure to supply the amounts of SWP water for which these cities have long contracted and paid, will result in their looking elsewhere. The only other viable source, beyond the existing reservoirs, is groundwater.

The local elected officials have long supported the concepts of well-managed slow growth, protected agricultural lands, and containing growth within urban areas. There is wide community support for these concepts. In order to preserve these concepts, the water supplies available to the County must be prudently managed.

Napa County's agricultural industry is well established and known. We don't want this industry to be placed in a position of risk. Should the SWP be unable to deliver the promised volumes of water, the Cities will be forced to explore groundwater supply options. Competition for the County's very limited groundwater supplies will result in enormous shifts in the urban versus agriculture equilibrium. The result will be economic, social, and ecological impacts from which the County will never be able to recover. These concerns must be addressed in the Draft EIS/EIR, and the impacts of, and mitigation measures for, not meeting the goals evaluated.

**Water Quality Improvement:** The water quality in Barker Slough, the point of origin for NBA water, is the poorest of the SWP supplies. The users in Solano and Napa Counties must have built in assurances that affirmative action will be taken to improve and stabilize water quality for our supply.

Because our subcontracting cities rely on the NBA for the majority of their water supply, and in one case, almost all of their water supply, we are very concerned about project alternatives that actually degrade the quality of NBA water. Just because we are a relatively small contractor doesn't mean that we should be left to suffer with the negative impact of degraded water quality when viewed in the entirety of the CALFED project. These negative impacts should be addressed, mitigation measures identified, and possible offsetting funding identified.

Our subcontracting cities have already spent considerable sums on treatment plant improvements. Again, some of the project alternatives actually degrade the quality of NBA water. If these project alternatives were implemented, the cities would have to suffer from both capital upgrade expenses and ongoing operations costs resulting from a degraded quality of water. These negative impacts should be addressed, mitigation measures identified, and possible offsetting funding identified.

The Solano County Water Agency was recently notified that it would receive a grant for a watershed management study project. We support this effort, and believe that the selected alternative needs to include elements that will assure that this study is adequately completed and that the study's recommendations are fully implemented. Water quality is of concern to all SWP users. The findings of this study, and the resulting remedy / mitigation strategy can be implemented elsewhere in the SWP area on a correlation basis.

All SWP contractors, and our consumers, want better water quality. The recommended alternative must squarely address that universal need, and result in improved water quality. This is an especially poignant issue for NBA users. The impacts of not meeting your stated water quality goals, and resulting mitigation measures, must be addressed as well.

It may be that the relocation of the NBA intake is the solution for much of this problem. This option for relocation as a mitigation measure must be evaluated, and included in the Draft EIS/EIR. The negative impacts, and resulting mitigation measures, of not relocating the intake should be evaluated. Funding sources for relocation of the intake should be identified.

**Ecosystem Restoration:** The southern portion of Napa County contains ecosystems that afford unique opportunities for both preservation and restoration. Substantial tracts of land are potentially available for acquisition and preservation. These sites will assure sustainable flora and fauna habitats that will mitigate non-point sources of pollution. While funding was recently approved for a modest acquisition, we firmly believe that more and substantial funding needs to be allocated to these acquisitions. Napa County has the ability to play an important role in the future of the ecosystem preservation and restoration effort for the Bay-Delta system.

In closing, we believe that the impacts of each of the alternatives and their permutations need to be studied in light of the concerns that we have raised. Further, we believe that funding for the improvements associated with the alternative that is ultimately selected needs to be allocated.

We look forward to reviewing any revisions to this Draft Programmatic EIS/EIR. Napa remains vitally interested in its water supplies.

Sincerely,



KENNETH H. JOHANSON  
Director of Public Works

Cc: Board of Supervisors  
County Administrator  
Planning Director  
NBA Subcontractor Cities; Attn: Public Works Directors  
Solano County Water Agency  
Senator Johanneson